

1 Charles A. Jones, Esq., SBN 6698
2 Caj@cjoneslawfirm.com
3 **JONES LAW FIRM LLC**
4 18124 Wedge Parkway, #511
5 Reno, Nevada 89511
6 Telephone: (775) 853-6440
7 Facsimile: (775) 853-6445

8
9 EDWARD J. WYNNE
10 ewynne@wynnelawfirm.com
11 **WYNNE LAW FIRM**
12 80 E. Sir Francis Drake Blvd., Suite 3G
13 Wood Island Larkspur, CA 94939
14 Telephone: (415) 461-6400
15 Facsimile: (415) 461-3900

16
17 *Attorneys for Plaintiff and the Proposed Class*
18 [Additional counsel on signature page]

19 Todd L. Bice, Bar No. 4534
20 **PISANELLI BICE PLLC**
21 400 S. 7th Street Suite 300
22 Las Vegas, NV 89101
23 Telephone: 702.214.2100
24 tlb@pisanellibice.com

25 Angela C. Agrusa*
26 **DLA PIPER LLP (US)**
27 2000 Avenue of the Stars
28 Suite 400 North Tower
29 Los Angeles, CA 90067-4735
30 Telephone: 310.595.3000
31 angela.agrusa@us.dlapiper.com

32
33 **Pro hac vice application forthcoming*

34
35 *Attorneys for Defendant*
36 *MGM Resorts International*

37
38 **UNITED STATES DISTRICT COURT**
39 **DISTRICT OF NEVADA**

40
41 MICHELLE RIGHETTI, individually and on
42 behalf of all others similarly situated,
43 Plaintiff,

44 v.
45
46 MGM RESORTS INTERNATIONAL,
47
48 Defendant.

49 Case No. 2:23-cv-02064-APG-DJA

50
51 **STIPULATION TO EXTEND TIME**
52 **TO FILE DEFENDANT'S**
53 **RESPONSE TO COMPLAINT**
54 **(FIRST REQUEST)**

55
56
57
58

59
60 STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
61 CASE NO. 2:23-CV-02064

1 Pursuant to LR IA 6-1, Plaintiff Michelle Righetti and Defendant MGM Resorts
 2 International (“MGM”) (collectively, the “Parties”) respectfully stipulate that MGM’s time
 3 to respond to the Complaint be extended from the current deadline of March 1, 2024, to and
 4 including March 11, 2024. This is the first stipulation for an extension of time to file MGM’s
 5 responsive pleading.

6 Good cause exists to enlarge the time for MGM to respond to the Complaint. There
 7 are currently thirteen other related actions filed against MGM pending in this District (the
 8 “Related Actions”). *See Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480; *Kirwan v. MGM*
 9 *Resorts Int’l*, No. 2:23-cv-01481; *Zussman v. VICI Properties 1 LLC, et al.*, No. 2:23-cv-
 10 01537; *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549; *Pircio v. MGM Resorts Int’l*, No.
 11 2:23-cv-01550; *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577; *Rundell v. MGM Resorts*
 12 *Int’l*, No. 2:23-cv-01698; *Bezak v. MGM Resorts Int’l*, No. 2:23-cv-01719; *Albrigo v. MGM*
 13 *Resorts Int’l*, No. 2:23-cv-1981; *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v.*
 14 *MGM Resorts Int’l*, No. 2:23-cv-01826; *Mejia v. MGM Resorts Int’l, et al.*, No. 2:24-cv-
 15 00081; *Sloan v. Vici Properties, Inc.*, No. 2:23-cv-02042.

16 On December 6 and December 20, 2023, plaintiffs’ counsel in six consolidated
 17 putative class actions brought against MGM by individuals who allege their PII was
 18 compromised as a result of a cybersecurity incident involving MGM in 2019 (the “2019
 19 Actions”) filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1,
 20 notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM*
 21 *Resorts Int’l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF 186, 188. Plaintiffs
 22 in this action will oppose this effort because the 2019 Actions involved a different threat
 23 actor and different data. No order has issued on the notices filed by the plaintiffs in the 2019
 24 Actions, and MGM has not responded to any other Complaint in the Related Actions.

25 While the foregoing matters are pending resolution, and to best ensure efficient
 26 management of this and the other Related Actions, there is good cause to permit additional
 27 time for the various parties to the Related Actions to meet and confer prior to the response
 28 to the Complaint in this action being due.

The Parties' request is made in good faith to enable the parties to finalize these meet-and-confers and to conserve judicial and party resources. Moreover, this case is in its infancy, and this request will not prejudice any party.

WHEREAS the Parties respectfully request that MGM shall have until March 11, 2024, to answer, move, or otherwise respond to the Complaint.

Dated: February 27, 2024

Respectfully submitted,

/s/ Charles A. Jones
Charles A. Jones, Esq., SBN 6698
Caj@cjoneslawfirm.com
JONES LAW FIRM LLC
18124 Wedge Parkway, #511
Reno, Nevada 89511
Telephone: (775) 853-6440
Facsimile: (775) 853-6445

EDWARD J. WYNNE
ewynne@wynnelawfirm.com
WYNNE LAW FIRM
80 E. Sir Francis Drake Blvd., Suite 3G
Wood Island Larkspur, CA 94939
Telephone: (415) 461-6400
Facsimile: (415) 461-3900

NIALL P. McCARTHY
COTCHETT, PITRE & McCARTHY
840 Malcolm Road
Burlingame, CA 94010
Telephone: (650) 697-6000

Attorneys for Plaintiff

/s/ Todd L. Bice

Todd L. Bice
PISANELLI BICE, PLLC
400 S. 7th Street Suite 300
Las Vegas, NV 89101
Telephone: 702.214.2100
tlb@pisanellibice.com

Angela C. Agrusa
DLA PIPER LLP (US)
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, CA 90067-4735
Telephone: 310.595.3000
Angela.agrusa@us.dlapiper.com

1 *Attorneys for Defendant*
2 *MGM Resorts International*
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
CASE NO. 2:23-CV-02064

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHELLE RIGHETTI, individually and on behalf of all others similarly situated,

Plaintiff,

V.

MGM RESORTS INTERNATIONAL,

Defendant.

Case No. 2:23-cv-02064-APG-DJA

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT**

9 Upon consideration of the foregoing stipulation to extend Defendant MGM Resorts
10 International's time to file response to Plaintiff's Complaint in the above-captioned action,
11 it is hereby **ORDERED** that the Stipulation is **GRANTED**, and the time for MGM Resorts
12 International to answer, move, or otherwise respond to Plaintiff's Complaint is hereby
13 extended to and including March 11, 2024.

IT IS SO ORDERED:

DANIEL J. ALBREGTS
UNITED STATES MAGistrate

UNITED STATES MAC

UNITED STATES MAGISTRATE JUDGE

DATED: 2/28/2024

ORDER GRANTING STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
CASE NO. 2:23-CV-01481